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\* *Pro hac vice* to be submitted.

*Attorneys for Defendant Hibu Inc.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

BLAKE COOLEY, individually and on behalf  
of all others similarly situated,

Plaintiff,

vs.

HIBU INC., a Delaware Corporation,

Defendant.

Case No. 19-cv-00269-MMD-VCF

**DEFENDANT’S UNOPPOSED MOTION  
FOR LEAVE FOR AN EXTENSION OF  
TIME TO RESPOND TO PLAINTIFF’S  
CLASS ACTION COMPLAINT**

**(FIRST REQUEST)**

Defendant Hibu Inc. (“Hibu”) respectfully files this motion for leave for an extension of time to respond to Plaintiff Blake Cooley’s (“Plaintiff”) class action complaint. Dkt. No. 1.

The deadline for Hibu to respond to Plaintiff’s class action complaint is March 20, 2019.

DEFENDANT’S UNOPPOSED MOTION FOR LEAVE FOR AN EXTENSION OF TIME TO RESPOND TO PLAINTIFF’S CLASS ACTION COMPLAINT(FIRST REQUEST) - 1

1 Due to the nature of the allegations in this Telephone Consumer Protection Act class action, Hibu  
2 requests the Court extend the time to file its response by 21 days to April 10, 2019.

3 Plaintiff's counsel consented to the filing of this motion on March 18, 2019 via email.

4 If granted, the new deadline for Hibu to file its response to Plaintiff's class action  
5 complaint would be no later than Wednesday, April 10, 2019. This request is made in good faith  
6 and for no improper purpose and does not prejudice either party.  
7

8 WHEREFORE, Hibu respectfully requests the Court grant this motion for leave for an  
9 extension of time to respond to Plaintiff's class action complaint.  
10

11 Dated: March 19, 2019

Respectfully submitted,

12 /s/ Charles H. McCrea  
13 Charles H. McCrea  
14 HEJMANOWSKI & MCCREA LLC  
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19 Kansas City, Missouri 64108  
\* *Pro hac vice* to be submitted.

20 *Attorneys for Defendant Hibu Inc.*

21  
22 IT IS SO ORDERED:

23   
24 \_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE

25 DATED: 3-20-2019  
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/s/ Charles H. McCrea  
Charles H. McCrea